

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MONICA BUTLER,	§ § §
Plaintiff,	§ § §
v.	§ CIVIL ACTION NO. 3:16-CV-2875-M § §
UNITED MANUFACTURING HOLDINGS, LLC, UNITED LABORATORIES MANUFACTURING, LLC, and ADP, LLC,	§ § § § § §
Defendants.	§ §

**JOINT MOTION TO CONTINUE DEADLINES TO COMPLETE SCHEDULING
CONFERENCE AND FILE JOINT REPORT**

Plaintiff Monica Butler (“Plaintiff”) and Defendants United Manufacturing Holdings, LLC, United Laboratories Manufacturing, and ADP TotalSource XXII, Co., Inc. (incorrectly named as ADP, LLC) (collectively, “Defendants”), file this Motion to continue the deadlines to complete a scheduling conference pursuant to Federal Rule of Civil Procedure 26(a)(1) and to submit a Joint Report.

Pursuant to the Court’s October 17, 2016 Order Requiring Scheduling Conference and Report for Contents of Scheduling Order (Doc. 4), the following deadlines have been set:

- Deadline to complete Scheduling Conference: October 31, 2016
- Deadline to submit Joint Report: November 7, 2016

The parties ask that these deadlines be continued for a period of two weeks as follows:

- Deadline to complete Scheduling Conference: November 14, 2016
- Deadline to submit Joint Report: November 21, 2016

The parties have exchanged communications and are still evaluating the possibility of arbitrating this matter. Due to existing travel obligations through the week of October 31, however, the parties require additional time to obtain client approval, reach a determination on arbitration, and prepare and finalize the contents required for the Joint Report.

This continuance is not sought for the purpose of delay, but so that justice may be done. Further, this continuance will allow sufficient time pursuant to Federal Rule of Civil Procedure 16(b) for entry of a Scheduling Order within 60 days after Defendants appeared in this Court and within 90 days of service of the Complaint on Defendants. The parties do not anticipate that the following deadlines will interfere with any subsequent deadlines entered by the Court.

Accordingly, the parties respectfully request that the Court grant this Motion and enter an Order extending the current deadlines to complete a scheduling conference and submit a Joint Report by two weeks as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this 31st day of October, 2016, I hereby certify that a true and correct copy of the foregoing pleading was electronically filed with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court, and the electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means, as follows:

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